

REMARKS

The Official Action of April 1, 2005, and the prior art cited therein have been carefully reviewed. The claims in the application remain as claims 1-12, and these claims define (consistent with what appears in the Official Action) novel and unobvious subject matter under §§102 and 103, and should be in condition for formal allowance. Such is respectfully requested.

Acknowledgement by the PTO of the receipt of applicant's papers filed under §119 **would be appreciated**. In this regard, applicant notes that the priority documents were filed in the parent application, and priority has been claimed.

Applicant thanks the examiner for helpfully pointing out the typographical error in claim 5. This has been corrected above.

Claim 1 has been rejected under the second paragraph of §112. This rejection is respectfully traversed.

With regard to the expression "fibrous shoddy", the claims have not been amended, i.e. the terminology remains the same for reasons pointed out below, although applicant would appreciate any suggestions from the examiner if the examiner

remains adamant after consideration of applicant's remarks in this regard.

Thus, the term "shoddy" has more than one definition, and is absolutely clear from the present specification what the appropriate definition is for the present application. **According to Webster's Encyclopedia Unabridged Dictionary of the English Language, Gramercy Books, New York/Avenel, New Jersey, 1989, "shoddy" is defined as: "fibrous material obtained by shredding unfelted rags or waste".** Accordingly, it is absolutely clear that this is the meaning of the term "shoddy" employed in the present application, and there is no danger whatsoever of any confusion.

Applicant therefore believes that the claims as originally drafted, particularly when considered in light of applicant's specification (fully consistent with the law), would not have been confusing to those skilled in the art, and therefore the claims in their previous form are fully in accordance with §112. At **worst**, claim 1 in its original form might be considered objectionable in use of the terminology "raw material", but **only** as to form, requiring no substantial amendment relating to patentability.

Nevertheless in deference to the examiner's views and to avoid needless argument, claim 1 has now been amended

as helpfully suggested by the examiner to change "raw material" to "starting material". Such an amendment is of course merely cosmetic, i.e. of a formal nature only, not a "narrowing" amendment because the scope of the claims has not been reduced. No limitations have been added and none are intended; the meaning of the claims remains the same.

Withdrawal of the rejection is respectfully requested.

Claims 2-12 have not been rejected on any basis, and claim 1 has not been rejected on the basis of any prior art. Paragraph 4 indicates that claim 1 "would be allowable...." Applicant accordingly understands that applicant's claims are deemed by the PTO to define novel and unobvious subject matter under §§102 and 103.

The prior art documents made of record and not relied upon have been noted, along with the implication that such documents are deemed by the PTO to be insufficiently pertinent to warrant their application against any of applicant's claims.

Applicant believes that all issues raised in the Office Action have been addressed in manner favoring patentability, whereby the present application should be condition for formal allowance. Accordingly, favorable

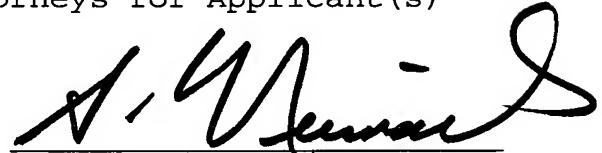
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consideration and early formal allowance are respectfully  
urged.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.  
Attorneys for Applicant(s)

By

A handwritten signature in black ink, appearing to read "S. Neimark", written over a horizontal line.

Sheridan Neimark

Registration No. 20,520

SN:jaa  
Telephone No.: (202) 628-5197  
Facsimile No.: (202) 737-3528  
G:\bn\o\onsa\johansen3a\pto\Amd 1JL05.doc